

## **EXHIBIT 20**

**From:** Richard Vagas  
**Sent:** Thursday, June 16, 2022 11:16 AM  
**To:** 'Sarah Jones' <[sjones@BSFLLP.com](mailto:sjones@BSFLLP.com)>  
**Cc:** Sami Rashid <[samirashid@quinnmanuel.com](mailto:samirashid@quinnmanuel.com)>; Allison Silber <[allisonsilber@quinnmanuel.com](mailto:allisonsilber@quinnmanuel.com)>; Michael Mitchell <[mmitchell@bsfllp.com](mailto:mmitchell@bsfllp.com)>; Kae Moat <[kmoat@BSFLLP.com](mailto:kmoat@BSFLLP.com)>  
**Subject:** RE: Pork - JBS Sales Data Product Exclusions

Sarah,

With regard to the letter sent by Travis Wheeler on May 31, the parties previously engaged in extensive negotiations addressing the scope of Defendants' structured data productions. As indicated in JBS USA's Responses and Objections to Certain Direct Action Plaintiffs' First Requests for Production of Documents to Pork Integrator Defendants served on November 22, 2021, "[a]fter conducting multiple rounds of negotiations over several months addressing the scope of production and associated search terms, JBS USA agreed to produce documents and data in response to [All Plaintiffs' First Set of Requests for Production of Documents to the Pork Integrator Defendants, dated November 1, 2018], which largely overlap with the [DAPs'] Requests." Specifically in response to Request 28, JBS USA indicated, "[s]ubject to and without waiving the foregoing, and with regard to the time period from January 1, 2005 through December 31, 2020 only, JBS USA has already produced responsive, nonprivileged Structured Data that it maintains in the ordinary course of business sufficient to show its sales of Pork in the U.S., and will produce any such remaining data in the same or similar format to the extent this information is in JBS USA's possession, custody or control, and able to be located by JBS USA through a reasonable search, as defined in Scope Limitation No. 5. See Amended Responses, 47-48 (Response to Request No. 37)."

Those Responses and Objections were served nearly seven months ago, and DAPs never raised an issue. Yet, DAPs now for the first time demand a significant expansion of the scope of JBS USA's previously agreed upon structured data offer of production – seeking data that was explicitly considered and rejected during protracted negotiations among the parties. Since last year, JBS USA has relied upon the agreements arising out of those previously-unchallenged negotiations when expending substantial time and resources to collect and prepare its voluminous structured data productions. While JBS USA has cooperatively agreed to certain search strings requested by various DAPs and continues to evaluate DAPs' recent, limited request whether it has structured data from prior to 2010 regarding weight of the heads killed, JBS USA cannot accede to Mr. Wheeler's obviously burdensome request to restart data negotiations and data productions at this late stage. We can be available to discuss further as necessary.

Thanks,  
Rich

**Richard T. Vagas**  
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**From:** Sarah Jones [<mailto:sjones@BSFLLP.com>]  
**Sent:** Monday, June 13, 2022 10:55 AM  
**To:** Richard Vagas <[richardvagas@quinnmanuel.com](mailto:richardvagas@quinnmanuel.com)>  
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**Subject:** Pork - JBS Sales Data Product Exclusions

[EXTERNAL EMAIL from [sjones@bsfllp.com](mailto:sjones@bsfllp.com)]

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Richard,

On May 31, Travis Wheeler sent a letter to JBS and several other Defendants regarding products excluded from Defendants' sales data. I follow-up regarding the letter's request that JBS promptly produce its structured sales data in four categories. Please let me know your team's availability for a meet and confer this week. Thank you.

Best,  
Sarah

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